



THE TEDESCHI LAW FIRM, P.A.
1422 LAUREL STREET
COLUMBIA, SOUTH CAROLINA 29201

DEBRA SHERMAN TEDESCHI*

*ALSO ADMITTED IN PA

June 30, 2011

VIA E-FILING

The Honorable Jocelyn Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

**RE: CMC Steel – South Carolina
Application of South Carolina Electric & Gas Company for Approval to
Revise Rates Under the Base Load Review Act, Docket No. 2011-207-E**

Dear Ms. Boyd:

Enclosed for filing please find the *Petition to Intervene of CMC Steel South Carolina* in the above-referenced matter. By copy of this letter, I am serving all parties of record. If you have any questions relating to the enclosed please do not hesitate to contact me.

Thank you for your assistance with this matter.

Sincerely yours,

Debra S. Tedeschi

Enclosures

cc: Damon E. Xenopoulos, Esq.

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

Application of of South Carolina Electric & Gas)	
Company for Approval to Revise Rates Under)	Docket No. 2011-207-E
the Base Load Review Act)	

PETITION TO INTERVENE OF CMC STEEL SOUTH CAROLINA

CMC Steel South Carolina ("CMC") hereby petitions to intervene in the above-captioned proceeding. CMC states the following grounds in support of its petition.

1) CMC owns and operates a steel manufacturing facility in Cayce, South Carolina. This facility utilizes an electric arc furnace ("EAF") to melt and recycle steel. This process requires CMC to purchase very large quantities of electricity from South Carolina Electric & Gas Company ("SCE&G") at a cost of millions of dollars a year. Because the cost of electricity is one of the major costs of steel-making utilizing an EAF, the cost of electric power directly affects CMC's ability to produce steel at a competitive price. CMC is one of the largest retail customers of SCE&G.

2) Due to the magnitude and unique characteristics of its load, CMC cannot be adequately represented by any other party to this proceeding. At this stage of the proceeding, CMC has not fully determined what positions it may take.

3) CMC's mailing address is:

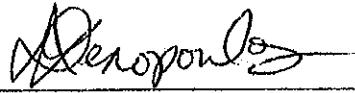
CMC Steel South Carolina
310 New State Road
Cayce, SC 29033

4) CMC is represented by the Washington, D.C. law firm of Brickfield, Burchette, Ritts & Stone, P.C. in various matters regarding electric rates and service. In the past few years, attorneys of the firm have appeared before this Commission, the Federal Energy Regulatory Commission, and many other state utility commissions. In accordance with Rule 103-804

S.(1)(b) of the Commission's Rules of Practice and Procedure, Brickfield, Burchette, Ritts & Stone, P.C. will associate with Debra Sherman Tedeschi of The Tedeschi Law Firm, P.A., 1422 Laurel Street, Columbia, SC 29201, LLC, local counsel licensed to practice in South Carolina. Service and correspondence regarding this proceeding should be sent to all of the undersigned.

WHEREFORE, for the reasons set forth above, CMC respectfully requests permission to intervene in this proceeding.

Respectfully submitted,



Damon E. Xenopoulos, Esq.
BRICKFIELD, BURCHETTE, RITTS & STONE, P.C.
1025 Thomas Jefferson Street, N.W.
Eighth Floor -- West Tower
Washington, D.C. 20007
(202) 342-0800

Debra Sherman Tedeschi
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1422 Laurel Street
Columbia, SC 29201
(803) 540-3090

Attorneys for CMC Steel South Carolina

Dated: June 30, 2011

**BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

Docket No. 2011-207-E

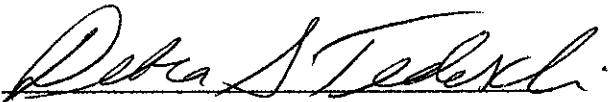
Application of South Carolina Electric & Gas)	
Company for Approval to Revise Rates Under)	CERTIFICATE OF SERVICE
the Base Load Review Act)	

This is to certify that I have caused to be served this 30th day of June, 2011 a copy of the *Petition to Intervene of CMC Steel South Carolina* via first-class mail, postage pre-paid, to the persons named below at the addresses set forth below:

K. Chad Burgess
South Carolina Electric & Gas Company
MC C222
220 Operation Way
Cayce, SC 29033-3701
chad.burgess@scana.com

Matthew W. Gissendanner
South Carolina Electric & Gas Company
MC C222
220 Operation way
Cayce, SC 29033-3701
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